

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

RENEE GALLOWAY, *et al.*,

Plaintiffs,

v.

JUSTIN MARTORELLO, *et al.*,

Defendants.

Case No. 3:19-cv-00314-REP

**PLAINTIFFS' NOTICE OF WITHDRAWAL OF THEIR MOTION TO REPATRIATE
FOREIGN ASSETS AND FOR AN EVIDENTIARY HEARING**

Defendant Bluetech Irrevocable Trust and its trustee, Matt Martorello, represent in their Opposition to Plaintiffs' Motion to Repatriate (ECF No. 619) that the remaining assets of the Trust have been transferred to Martorello's shell entity, BWH Texas, LLC, which has now filed for bankruptcy to evade this Court's jurisdiction. Evidence produced by Martorello has also shown that Martorello transferred a large share of the Bluetech Trust's assets to other overseas trusts and accounts under his control. Accordingly, based on the representation that Bluetech Trust itself has no remaining assets to repatriate, Plaintiffs respectfully withdraw their Motion to Repatriate (ECF No. 619) in this case, while reserving the right to refile the Motion should the facts later reveal that Bluetech Trust has retained or obtained assets to satisfy any judgment in this case or the judgment in the related *Williams* litigation.

Respectfully submitted,

RENEE GALLOWAY, et al.,

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